



4. Pursuant to Rule 6(a) of the Federal Rules of Civil Procedure and 28 U.S.C. §1446(b), this Notice of Removal is filed within thirty (30) days after service of the initial pleading on which the aforesaid action is based.

5. The United States District Court for the District of Maryland is a federal judicial district embracing the District Court of Montgomery County, Maryland, where this suit was originally filed. Venue is therefore proper under 28 U.S.C. § 100.

6. Count I of Plaintiff's Complaint alleges violations of the FLSA.

7. 29 U.S.C. § 216(b) provides that a claim for a violation of the FLSA may be filed "in any Federal or State court of competent jurisdiction . . . ."

8. The Supreme Court has held that while FLSA claims may be filed in State court, such claims are nevertheless subject to removal to Federal court. *See Breuer v. Jim's Concrete of Brevard, Inc.*, 538 U.S. 691 (2003).

9. A copy of this Notice of Removal is being filed with the District Court of Montgomery County, Maryland, as provided by law, and written notice is being sent to Plaintiff's counsel.

10. The prerequisites for removal under 28 U.S.C. § 1441 have been met.

11. The allegations of this Notice are true and correct and this cause is removable to the United States District Court for the District of Maryland.

12. Pursuant to 28 U.S.C. § 1446(b)(2)(C), the other defendant to this action, Gali Service Industries, Inc., consents to the removal of this action.

13. If any question arises as to the propriety of the removal of this action, Bolana respectfully requests the opportunity to present a brief and oral argument in support of its position that this cause is removable.

14. While Bolana has filed this Notice of Removal with this Court and the District Court of Montgomery County, Maryland, Bolana does not concede that either Court has jurisdiction over it.

**WHEREFORE**, Bolana, by and through its counsel, and through the filing of this Notice of Removal, the giving of written notice thereof to Plaintiff, and the filing of a copy of this Notice of Removal with the District Court of Montgomery County, Maryland, effects the removal of said civil action to this Honorable Court.

Respectfully submitted,

Dated: February 2, 2015

*/s/ Jonathan G. Rose*

*/s/ Richard S. Siegel*

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*Counsel for Defendants*

*Gali Service Industries, Inc. and*

*Bolana Capitol Enterprises, Inc.*

**CERTIFICATE OF SERVICE**

This is to certify that I have this day, February 2, 2015, served Plaintiff with a true and correct copy of the within and foregoing **NOTICE OF REMOVAL OF CIVIL ACTION** via U.S. Mail, addressed as follow:

Mary Craine Lombardo  
Stein Sperling Bennett De Jong Driscoll PC  
25 West Middle Lane  
Rockville, MD 20850  
*Attorneys for Plaintiff*

/s/ Richard S. Siegel  
Richard S. Siegel